

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO.: 3:15cr39 CWA-LAA

DONALD PRICE

18 U.S.C. §371

The United States Attorney charges:

COUNT 1

From in or about at least November 2009, and continuing through at least January 16, 2010, in Kemper County, in the Northern Division of the Southern District of Mississippi and elsewhere, the defendant **DONALD PRICE** and co-conspirators **TIMOTHY BENJAMIN TAYLOR**, **TERENCE ANTONIO THOMPSON** and **CHRISTOPHER LASHAWN CHAMBERLIN**, did knowingly and willfully conspire with each other and with others known and unknown to the United States to commit the following offense against the United States:

To knowingly transfer, possess, or use, without lawful authority, a means of identification of another person with the intent to commit, or to aid or abet, or in connection with, any unlawful activity that constitutes a violation of Federal law, to-wit: wire fraud, or that constitutes a felony under any applicable State or local law, in violation of Section 1028(a)(7), Title 18 United States Code.

In furtherance of the unlawful conspiracy and in order to accomplish the objectives thereof, the following overt acts, among others, were committed:

In or about November, 2009, THOMPSON obtained stolen identities of unwitting persons, which contained the victims' personal identifying information, including but not limited to names, dates of birth, and social security numbers, and without lawful authority transferred that personal identifying information to TAYLOR.

Between November, 2009, and January 16, 2010, TAYLOR provided HERNDON with a list of fraudulently obtained identities to be used in the preparation of fraudulent forms W-2. HERNDON prepared the fraudulent forms W-2 and provided them to TAYLOR and defendant **PRICE**.

In or about January, 2010, TAYLOR and defendant **PRICE** met with CHAMBERLIN at C&T Tax Services in DeKalb, Mississippi and provided him with the fraudulent forms W-2, for the purpose of having CHAMBERLIN use those forms to prepare fraudulent Forms 1040, U.S. Individual Income Tax Returns, for the 2009 tax year.

On or about January 16, 2010, TAYLOR, THOMPSON, CHAMBERLIN, HERNDON and Defendant **PRICE** caused a false U.S. Individual Income Tax Return, Form 1040, in the name of L.D. to be electronically filed with the IRS by wire communication from DeKalb, Mississippi, to Austin, Texas, using the stolen personal identifiers belonging to L.D. and belonging to E.P., including but not limited to, names, dates of birth, and social security numbers.

On or about January 16, 2010, TAYLOR, THOMPSON, CHAMBERLIN, HERNDON and Defendant **PRICE** caused a false U.S. Individual Income Tax Return, Form 1040, in the name of S.G. to be electronically filed with the IRS by wire communication from DeKalb, Mississippi, to Austin, Texas, using the stolen personal identifiers belonging to S.G. and belonging to E.G., including but not limited to, names, dates of birth, and social security numbers.

On or about January 16, 2010, TAYLOR, THOMPSON, CHAMBERLIN, HERNDON and Defendant **PRICE** caused a false U.S. Individual Income Tax Return, Form 1040, in the name of D.W. to be electronically filed with the IRS by wire communication from DeKalb,

Mississippi, to Austin, Texas, using the stolen personal identifiers belonging to D.W. and belonging to M.W., including but not limited to, names, dates of birth, and social security numbers.

On or about January 16, 2010, TAYLOR, THOMPSON, CHAMBERLIN, HERNDON and Defendant **PRICE** caused a false U.S. Individual Income Tax Return, Form 1040, in the name of D.C. to be electronically filed with the IRS by wire communication from DeKalb, Mississippi, to Austin, Texas, using the stolen personal identifiers belonging to D.C. and belonging to S.C., including but not limited to, names, dates of birth, and social security numbers.

All in violation of Sections 371 and 2, Title 18, United States Code.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

As a result of committing the offenses as alleged in this Indictment, the defendants shall forfeit to the United States all property involved in or traceable to property involved in the offenses, including but not limited to all proceeds obtained directly or indirectly from the offenses, and all property used to facilitate the offenses. Further, if any property described above, as a result of any act or omission of the defendants: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other

property of the defendants, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to Section 981(a)(1)(C), Title 18, United States Code and Section 2461, Title 28, United States Code.


GREGORY K. DAVIS
United States Attorney